

FILED
HARRISBURG, PA

MAY 22 2006

MARY E. D'ANDREA, CLERK
Per *[Signature]*

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 1:CR-01-352-02
:
vs. :
:
BRADLEY LANARD LOTT : JUDGE SYLVIA RAMBO

MOTION FOR RECONSIDERATION OF MOTION FOR JAIL TIME CREDIT
OR PRIOR CUSTODY CREDIT PURSUANT TO [18 U.S.C. § 3585(b)]

COMES NOW, THE DEFENDANT, BRADLEY LANARD LOTT, PRO SE, HEREBY RESPECTFULLY
MOVE THIS MOST HONORABLE COURT TO RECONSIDER GRANTING DEFENDANT JAIL TIME CREDIT
OR PRIOR CUSTODY CREDIT OF APPROXIMATELY 609 DAYS PURSUANT TO [18 U.S.C. § 3585(b)],
FOR THE MORE FOLLOWING REASONS:

1) ON 04-08-2003, DEFENDANT WAS SENTENCED BY THIS HONORABLE COURT TO 151
MONTHS ON COUNT 1 OF DEFENDANT'S INDICTMENT FOR CONSPIRACY POSSESSION WITH INTENT
TO DELIVER AN UNSPECIFIED AMOUNT OF CRACK COCAINE.

a) THIS INDICTMENT CARRIED ANOTHER COUNT, COUNT 2, WHICH WAS POSSESSION
WITH THE INTENT TO DELIVER AN UNSPECIFIED AMOUNT OF CRACK COCAINE, WHICH WAS DROPPED
DURING THE PLEA AGREEMENT HEARING. THE DEFENDANT'S COUNSEL, JOHN PHILLPOT, AGREE
WITH THE COURTS TO DROP THE SECOND COUNT, WITHOUT FULLY EXPLAINING TO THE DEFENDANT
THAT COUNT 1 COULD GET THE DEFENDANT A SUBSTANTIAL AMOUNT OF PRISON TIME. THE
COUNSEL FOR THE DEFENDANT DIDN'T EXPLAIN FULLY TO THE DEFENDANT WHAT CONSPIRACY
MEANT. THE COUNSEL WAS PAID FOR BY THE GOVERNMENT (PUBLIC DEFENDER) AND THE DEFEND-
ANT ALWAYS FELT, THAT THE COUNSEL WASN'T IN THE DEFENDANT'S BEST INTEREST. THE
DEFENDANT FILED A MOTION TO WITHDRAWAL COUNSEL BUT WAS DENIED BY SYLVIA RAMBO. IT
PROBABLY WOULD BE GOOD TO HAVE THE DEFENDANTS PAST AND CURRENT MOTIONS REVIEWED BY
ANOTHER JUDGE, IF THAT WAS POSSIBLE.

2) PRIOR TO 04-08-2003 (SENTENCING DATE), DEFENDANT WAS IN OFFICIAL DETENTION
OR DETAINED IN THE YORK COUNTY PRISON IN YORK, PENNSYLVANIA FROM 08-07-2001 TO
04-08-2003, APPROXIMATELY 609 DAYS: ON COUNTS 1 & 2, OF THE ORIGINAL INDICTMENT
POSSESSION AND CONSPIRACY POSSESSION OF 50 OR MORE GRAMS OF CRACK COCAINE.

a) THE ORIGINAL INDICTMENT WAS IN PLACE BEFORE THE DEFENDANT WAS CHARGE
BY THE STATE, GRANTING THAT HE WAS IN ORIGINAL JURISDICTION OF THE UNITED STATES
DISTRICT COURT, BUT THE DEFENDANT WAS NEVER TOLD BY COUNSEL OR STATE AND FEDERAL
COURTS WHICH JURISDICTION THE DEFENDANT WAS IN. THE U.S. CONSTITUTION, PARTICULARLY
THE DUE PROCESS CLAUSE, ALSO ESTABLISHES LIMITS ON THE JURISDICTION OF THE STATE
COURTS. THESE DUE PROCESS LIMITATIONS TRADITIONALLY OPERATE IN TWO AREAS:

EXHIBIT A

A06

P. 138

DC-16E	SENTENCE STATUS SUMMARY	COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS
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1. REFERENCES AND IDENTIFICATION

DOC Number FK6328	Commitment Name BRADLEY LOTT	PBPP No	SID No 25742800	FBI Number 521222KB8	Phila Photo #
Date of Birth 05/26/1976	Place of Birth EUSTIS FL USA			Race B	Sex M

2. SENTENCE SUMMARY

Sent Date	County	Indictments	Sent Type	Minimum			Maximum		
				Y	M	D	Y	M	D
06/04/2003	YORK	CP4408/2001		1	10		3	8	
Plea:	Guilty	OTN: L0977362	Judge: KENNEDY, JOHN						
Offense:	DRUG - MANUFACTURE/SALE/DELIVER OR POSSESS W/INTENT TO								
06/04/2003	YORK	CP5468 CT 1/2001	CC	3			6		
Plea:	Guilty	OTN: H1819204	Judge: KENNEDY, JOHN						
Offense:	DRUG - MANUFACTURE/SALE/DELIVER OR POSSESS W/INTENT TO								
06/04/2003	YORK	CP5468 CT 2/2001	CC	1			2		
Plea:	Guilty	OTN: H1819204	Judge: KENNEDY, JOHN						
Offense:	DRUG - MANUFACTURE/SALE/DELIVER OR POSSESS W/INTENT TO								
06/04/2003	YORK	CP5468 CT 3/2001	CC	3			6		
Plea:	Guilty	OTN: H1819204	Judge: KENNEDY, JOHN						
Offense:	DRUG - MANUFACTURE/SALE/DELIVER OR POSSESS W/INTENT TO								
06/04/2003	YORK	CP5468 CT 4/2001	CC	3			6		
Plea:	Guilty	OTN: H1819204	Judge: KENNEDY, JOHN						
Offense:	DRUG - MANUFACTURE/SALE/DELIVER OR POSSESS W/INTENT TO								

Controlling Minimum Date	08/24/2004		Reentered from Previous DOC#:	
Controlling Maximum Date	08/24/2007		New Maximum - PV	

Non-incarcerated Offenses

Comments:

Summary or Remarks on Sentence

EXHIBIT 3

LORMJ 540*23 *
PAGE 002 *

SENTENCE MONITORING
COMPUTATION DATA
AS OF 05-23-2005

* 05-23-2005
* 13:32:22

REGNO.: 11288-067 NAME: LOTT, BRADLEY LANORD

-----CURRENT COMPUTATION NO: 010 -----

COMPUTATION 010 WAS LAST UPDATED ON 05-09-2005 AT LOR AUTOMATICALLY

THE FOLLOWING JUDGMENTS, WARRANTS AND OBLIGATIONS ARE INCLUDED IN
CURRENT COMPUTATION 010: 010 010

DATE COMPUTATION BEGAN.....: 01-11-2005
TOTAL TERM IN EFFECT.....: 151 MONTHS
TOTAL TERM IN EFFECT CONVERTED...: 12 YEARS 7 MONTHS
EARLIEST DATE OF OFFENSE.....: 08-07-2001

TOTAL PRIOR CREDIT TIME.....: 0
TOTAL INOPERATIVE TIME.....: 0
TOTAL GCT EARNED AND PROJECTED...: 592
TOTAL GCT EARNED.....: 0
STATUTORY RELEASE DATE PROJECTED: 12-27-2015
SIX MONTH /10% DATE.....: N/A
EXPIRATION FULL TERM DATE.....: 08-10-2017

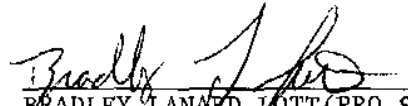
PROJECTED SATISFACTION DATE.....: 12-27-2015
PROJECTED SATISFACTION METHOD....: GCT REL

REMARKS.....: JUDGMENT SILENT AS TO RELATIONSHIP OF FEDERAL SENTENCE TO PA
STATE SENTENCE. PURSUANT TO 18 USC 3584(A), FEDERAL SENTENCE
WILL BE COMPUTED AS CONSECUTIVE. PAROLED FROM PA SENTENCE ON
01-11-2005.

G0002 MORE PAGES TO FOLLOW . . .

CERTIFICATE OF SERVICE

I CERTIFY THAT I HAVE MAILED THIS "MOTION FOR RECONSIDERING JAIL TIME CREDIT OR PRIOR CUSTODY CREDIT PURSUANT TO [18 U.S.C. § 3585(b)], PAGES 1 & 2, EXHIBIT (a) & (b) TO: OFFICE OF THE CLERK, U.S. COURTHOUSE, 228 WALNUT STREET P.O. BOX 983, HARRISBURG, P.A. 17108, BY PLACING SAME IN THE U.S. POSTAL MAIL AT FPC BENNETTSVILLE, S.C.; VIA FIRST-CLASS, ON THIS 18 DAY OF May 2006.


BRADLEY LANARD HOTT (PRO SE)
REG. NO.: 11288067
FCI BENNETTSVILLE-SCP
PO BOX 52010
BENNETTSVILLE, S.C. 29512-5210

BRAD LOTT 11288067
FC.I. PO BOX 52010
BENNETTSVILLE, S.C. 29512-5210

FLORENCE SC 295

19 MAY 2005 PM 1 T



OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA
U.S. COURTHOUSE
228 WALNUT STREET
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HARRISBURG, PA 17108

LEGAL MAIL

17108+0383

